

REPLY UNDER 37 CFR 1.116 -

EXPEDITED PROCEDURE - TECHNOLOGY CENTER 2100

Serial No. 10/015,097

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Attorney Docket No. 10012346-1

Title: DYNAMIC MAPPING OF WIRELESS NETWORK DEVICES

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Claim Rejections Under 35 U.S.C. § 103

Claims 1-4 and 6-14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kuehnel et al. (U.S. Patent No. 5,787,077) in view of Jiang et al. (U.S. Patent No. 6,741,853). Applicant respectfully traverses as several assertions upon which the Office relies in support of rejection are in error.

The Office Action equates "mapping ATM cells received on the wireless access part into a selected virtual path" with "location of devices." Office Action, page 8, last paragraph. Applicant first notes that ATM cells are not network devices, but are communication packets transmitted by network devices. Kuehnel et al., column 1, lines 39-44 and Figure 1 ("An ATM cell (as the smallest information unit) includes a header field (5 bytes or octets) and a payload field (48 bytes or octets). As shown in FIG. 1, the ATM cell header contains, among other information, the VP and VC identifier(s) used for addressing inside the network (i.e., for routing the information to an intended destination)."). See, also, Kuehnel et al., column 10, lines 14-17 ("At the mapping unit 34 of access point 21, ATM cells transmitted by the mobile terminals are mapped . . ."). Thus, even if Kuehnel et al. could be read to map locations of communication packets, which Applicant contends is nonsensical with regard to communication packets, there is no reasoned statement as to how the mapping of locations of communication packets would teach or suggest mapping of locations of network devices wirelessly transmitting the packets. Applicant contends that the mapping of ATM cells has no bearing on the mapping of their corresponding network devices because the ATM cells are not a function nor a result of the location of the device creating and transmitting the ATM cell. Applicant thus contends that the assertion of the Office Action that location of devices is taught through the mapping of ATM cells is without basis, and that the Office has failed to make a *prima facie* case of obviousness.

In addition, there is no indication, teaching or suggestion in the cited references as to how the locations of device representations can be adapted for updating in response to changes in mapping information or otherwise. In fact, Kuehnel et al. expressly states that its virtual path, and thus its mapping information, is fixed while a mobile terminal is associated with an access

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point. Kuehnel et al., Abstract ("The Virtual Path identifier (VPI) used on the fixed link is selected based on the RCI assigned by the access point. The radio connection identifier RCI remains unchanged as long as the mobile terminal is associated with that access point."). Thus, regardless of where Kuehnel et al.'s mobile terminal moves within the geographical area covered by an access point, the associated virtual path for its communication packets will remain unchanged. Because Kuehnel et al.'s mapping information remains unchanged while its network devices are changing locations, Applicant contends that it has rebutted the Examiner's assertion that Kuehnel et al.'s representations of network devices depict a location of the network device relative to a reference point and that, as a result, the Office has failed to make a *prima facie* case of obviousness.

Kuehnel et al.'s access points 21 do not purport to know where a mobile terminal 22 is located, but only that it is within its geographical area of communication. With reference to Kuehnel et al.'s Figure 2, the access point represented by AP 21(1) knows that the mobile terminals represented by MT 22(1) and MT 22(m-1) are both within the geographical area covered by the access point, but there is no teaching or suggestion as to whether the mobile terminal represented by MT 22(1) is closer to the fixed link 23(1) than the mobile terminal represented by MT 22(m-1). Applicant respectfully requests that the Office provide a reasoned statement as to how the teachings of Kuehnel et al. and Jiang et al. combine to teach or suggest representations of network devices depicting locations of the network devices relative to a reference point, wherein the locations of the representations are adapted for updating in response to changes in mapping information and wherein the representations provide an indication of at least a relative distance between their respective network device and the reference point. The Office has simply cited to sections regarding generalized network architecture or communication connectivity without relating these concepts to device locations.

The Office Action asserts, "In figure 6, Kuehnel et al. discloses the access point and its interconnections, a representation of an audible device (item 25(1)) is highlighted to differentiate one representation of a network device (i.e. 22(1) from an audible (i.e. 25(i)) representing other network devices (i.e. 22(m-1))." Office Action, page 10, second full paragraph. Applicant contends that the Office's assertion is not related to Applicant's claim language. Claim 1 recites, in part, "wherein the representation of the first network device [that is requesting a service on the

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wireless network] is highlighted to differentiate it from representations of other network devices" and "wherein the representation of the second network device [that is capable of providing the requested service] is highlighted to differentiate it from representations of other network devices that are incapable of providing the requested service." Applicant notes that reference 25(1) of Kuehnel et al. refers to a radio connection, i.e., an electromagnetic link, and not a network device. As such, Applicant contends that whether it is highlighted is irrelevant to the language of Applicant's claim 1.

In view of the foregoing, and as further argued in Applicant's prior response of June 18, 2007, Applicant contends that the primary reference of Kuehnel et al. and the secondary reference of Jiang et al. fail to teach or suggest every limitation of Applicant's claim 1 in that they do not purport to concern dynamic mapping of a wireless network comprising representations of a plurality of network devices depicting locations of the network devices relative to a reference point. The Office has failed to make a *prima facie* case of obviousness because several of the assertions upon which it relies in support of rejection have been shown to be in error. In addition, because the secondary reference of Jiang et al. fails to teach or suggest limitations that the Office admits to be missing from the primary reference of Kuehnel et al., Applicant contends that the rejection under 35 U.S.C. § 103(a) must fail as the cited references, taken either alone or in combination, fail to teach or suggest each and every limitation of Applicant's claim 1.

In view of the foregoing, Applicant contends that claim 1 is patentably distinct from the cited references, taken either alone or in combination. As claims 2-4 and 6-14 include all patentable limitations of claim 1, these claims are also believed to be allowable. Applicant thus respectfully requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a), and allowance of claims 1-4 and 6-14.

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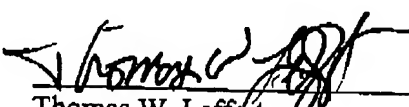
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CONCLUSION

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 08-2025.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2204.

Respectfully submitted,

Date: 5 NOV 07
Thomas W. Leffert
Reg. No. 40,697

Attorneys for Applicant
Attorneys for Applicant
HEWLETT-PACKARD COMPANY
Intellectual Property Administration
3404 East Harmony Rd.
Fort Collins, CO 80527-2400